

**EXHIBIT 76**  
**FILED UNDER SEAL**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

JANE DOE 1, individually and on  
behalf of all others similarly  
situated,

Plaintiff,

Civil Action No.

-against-

1:22-cv-10019-JSR

JP MORGAN CHASE BANK, N.A.

Defendants.

- - - - - x

Highly Confidential-Attorneys Eyes Only

Videotaped oral deposition of  
JUSTIN NELSON, taken pursuant to  
subpoena, was held BOIES SCHILLER  
FLEXNER, 55 Hudson Yards, New York, New  
York commencing April 21, 2023, 9:42  
a.m., on the above date, before Leslie  
Fagin, a Court Reporter and Notary  
Public in the State of New York.

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2 discussion within that meeting that led to 09:45:54

3 the conclusion that Jeffrey Epstein was going 09:45:56

4 to be terminated as a client? 09:45:57

5 A. I don't remember specifics. 09:45:59

6 Q. What was your understanding as to 09:46:00

7 the reason or reasons that Jeffrey Epstein 09:46:02

8 was going to be terminated? 09:46:04

9 A. Reputational risk. 09:46:06

10 Q. By reputational risk, what did that 09:46:08

11 mean in this particular context, that being 09:46:14

12 related to Jeffrey Epstein? 09:46:16

13 MR. BUTTS: Objection to form. 09:46:18

14 You can answer. 09:46:20

15 A. I think we are aware of the history 09:46:21

16 of Jeffrey, Mr. Epstein, I think that's what 09:46:26

17 went into that decision. 09:46:31

18 Q. Do you remember there being a 09:46:32

19 discussion about any specific banking 09:46:36

20 activity in which he was engaged at the time, 09:46:39

21 that being 2013 time period, that also 09:46:42

22 contributed to that decision? 09:46:46

23 MR. BUTTS: Objection to form. 09:46:47

24 You may answer. 09:46:50

25 A. I don't remember. 09:46:50

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2 Q. After Jeffrey Epstein has been 13:30:03  
3 terminated, you get the permission of John 13:30:04  
4 Duffy to continue a relationship with Jeffrey 13:30:10  
5 Epstein where he will be a potential source 13:30:13  
6 of future referrals? 13:30:15

7 MR. BUTTS: Objection to form. 13:30:17  
8 You may answer. 13:30:19

9 A. Yes. 13:30:19

10 Q. Do you remember where you were when 13:30:19  
11 you had these discussions with Mr. Duffy? 13:30:21

12 A. I do not. 13:30:23

13 Q. Were you given any parameters of 13:30:24  
14 what is okay to do and what is not okay to do 13:30:27  
15 with respect to the relationship with Jeffrey 13:30:30  
16 Epstein? 13:30:33

17 A. Yes. 13:30:33

18 Q. What were they? 13:30:33

19 A. We would not engage in any type of 13:30:35  
20 relationship where Mr. Epstein had control of 13:30:40  
21 a relationship, where we had to interface 13:30:43  
22 with him directly as a decisionmaker of any 13:30:46  
23 kind. 13:30:50

24 Q. At some point in time, even if that 13:30:50  
25 was the objective from the beginning to make 13:30:54

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2 sure you didn't have to interface with him to 13:30:57

3 get to a client, isn't that what happened 13:31:00

4 with respect to Leon Black? 13:31:03

5 MR. BUTTS: Objection, 13:31:05

6 mischaracterizes testimony. 13:31:07

7 Q. You can answer. 13:31:09

8 A. No because I never interfaced. We 13:31:12

9 spoke to Mr. Epstein, but he was never a 13:31:17

10 signer on an account for anyone else that we 13:31:22

11 interacted with, he was not a decisionmaker. 13:31:25

12 Q. Was there ever a point in time 13:31:30

13 where Leon Black was the client, but you and 13:31:33

14 your team could only speak with Mr. Epstein 13:31:37

15 as opposed to Mr. Black about the client 13:31:41

16 relationship? 13:31:45

17 MR. BUTTS: Objection. 13:31:46

18 You may answer. 13:31:48

19 A. We spoke to Mr. Epstein about 13:31:48

20 things related to Leon Black, but anything 13:31:51

21 that -- to actually do anything with Leon 13:31:56

22 Black had to go through Leon Black or his 13:32:00

23 family office. 13:32:02

24 Q. And Mr. Epstein was not able to be 13:32:03

25 a signatory on Mr. Black's accounts, right? 13:32:10

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2 A. Correct. 13:32:13

3 Q. Did there come a point in time 13:32:13

4 where there was a signatory, but Jeffrey 13:32:16

5 Epstein was the person that was making the 13:32:20

6 calls for Mr. Black? 13:32:22

7 MR. BUTTS: Objection to form. 13:32:25

8 You may answer if you are able. 13:32:26

9 A. There were times where Mr. Epstein 13:32:27

10 had a recommendation, but I can't remember 13:32:32

11 any of those things getting done, so, no. 13:32:38

12 Q. How many times do you think you 13:32:43

13 visited Mr. Epstein after he was terminated 13:32:48

14 from JPMorgan? 13:32:52

15 A. Several times. 13:32:54

16 Q. By several, ballpark what do you 13:32:55

17 think we are talking about? 13:33:01

18 A. Eight to 10, in that range. 13:33:02

19 Q. When is the last time that you 13:33:04

20 remember visiting Jeffrey Epstein, what year? 13:33:05

21 A. I don't remember. 13:33:08

22 Q. Did you visit Jeffrey Epstein as 13:33:09

23 late as 2017? 13:33:12

24 A. It is possible. 13:33:14

25 Q. Did you ever spend the night at any 13:33:16